

1 Z. Kathryn Branson, Esq.
Nevada Bar No. 11540
2 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
3 Suite 300
Las Vegas, Nevada 89169.5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 kbranson@littler.com

6 Attorney for Defendant
7 TELUS INTERNATIONAL (U.S.) CORP.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10
11 DAVID ISLAS, an Individual,
12 Plaintiff,

13 v.

14 TELUS INTERNATIONAL (U.S.)
CORP., a Foreign Corporation; DOES 1
15 Through 25, inclusive; and ROE
CORPORATIONS 1 Through 25,
16 inclusive,

17 Defendants.
18

Case No.: 2:24-cv-02230-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME FOR DEFENDANT TO
FILE RESPONSIVE PLEADING**

[FIRST REQUEST]

19 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff DAVID ISLAS (“Plaintiff”) and Defendant
20 TELUS INTERNATIONAL (U.S.) CORP. (“Defendant”) by and through their undersigned
21 counsel, hereby agree and stipulate to extend the time for Defendant to file a responsive pleading
22 from the current deadline of December 9, 2024, up to and including **December 17, 2024**.

23 Such extension is necessary in light of Plaintiff’s counsel trial schedule and the parties’
24 ongoing good faith discussions of pursuing this matter in an alternative forum in light of the
25 existence of an arbitration agreement, which is currently being reviewed by Plaintiff’s counsel.

26 ///

27 ///

28 ///

1 This is the first request for an extension of time to respond to the Complaint in this Court.

2 This request is made in good faith and not for the purpose of delay.

3 Dated: December 5, 2024

Dated: December 5, 2024

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Paul H. Wolfram



7 PATRICK W. KANG, ESQ.
8 KYLE R. TATUM, ESQ.
9 PAUL H. WOLFRAM, ESQ.
10 KANG & ASSOCIATES, PLLC

Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON P.C.

Attorneys for Defendant
TELUS INTERNATIONAL (U.S.) CORP.

Attorney for Plaintiff
DAVID ISLAS

11
12 **IT IS SO ORDERED.**

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 12/9/2024



4905-6353-9715.1 / 098858-1022